

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

KING RANGE, JR.,
Plaintiff,

v.

FLEMINGTON ESTATES LLC and
FRANKIE SHOP, LLC,
Defendants.

Case No: 1:25-cv-02633-MMG

NOTICE OF MOTION

**DEFENDANTS FRANKIE SHOP LLC'S
NOTICE OF MOTION TO DISMISS THE COMPLAINT**

PLEASE TAKE NOTICE that, pursuant to Fed. R. Civ. P. 12(b)(6), Defendant Frankie Shop LLC., upon their accompanying Memorandum of Law, the Declaration of Jonathan Hong and the exhibits thereto, and all prior pleadings and proceedings herein, move this Court before the Honorable Margaret M. Garnett for an order dismissing Plaintiff's claims in the Complaint (ECF No. 1) as alleged against Defendant Frankie Shop. in their entirety, with prejudice, and for such other and further relief as the Court may deem just and proper.

Dated: June 20, 2025

Respectfully submitted,

/s/ Jonathan S. Hong

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